

COMMONWEALTH OF KENTUCKY  
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET  
DEPARTMENT FOR ENVIRONMENTAL PROTECTION  
DIVISION OF WASTE MANAGEMENT  
FRANKFORT, KENTUCKY 40601

NOTICE OF VIOLATION

TO: SKF Industries  
P.O. Box 728  
Glasgow, Ky 42141

Date of Violation: Observed 11-5-92  
County: Barren  
ID#: KYD-001-737-683

This is to advise you that, because of the circumstances noted below, you are in violation of the provisions of:

( ) KRS 224, ( ) KRS 151, ( ) KRS 223, ( ) KRS 146, (X) 401 KAR  
Regulation(s): 401 KAR 32:100.

The extent of the violation(s) observed is as follows:  
Failure to provide handling codes for shipment #00003 to Safety-Kleen, July 6, 1992.

Required action for remedial measures include, but are not limited to: Submit a copy of the corrected waste manifest, with proper handling codes, to the Bowling Green Regional Office by December 5, 1992.

Violations of the above cited Kentucky Revised Statutes are subject to the maximum penalties of \$25,000 per day for each hazardous waste violation and \$1,000 per day for each solid waste violation.

To respond to this Notice of Violation, write to:

Division of Waste Management  
1508 Westen Avenue  
Bowling Green, Ky 42104

Attention: Kerry McDaniel, or call (502) 843-5475

Signatures:

Robbi McDaniel Title: Inspector

Date: 11-9-92

Kerry McDaniel Title: Supervisor

Date: 11-9-92

Name of persons to whom copy was delivered:

Rick Elliot Title: Production Administrator

Date: 11-9-92

How Delivered:

X Certified Mail P 900 791 442      Personal Service





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DIVISION OF WASTE MANAGEMENT  
1508 Westen Avenue  
Bowling Green, KY 42104  
(502) 843-5475

**RCRA HAZARDOUS WASTE INSPECTION REPORT**

1) **FACILITY INFORMATION**

ID#: KYD-001-737-683  
SKF Industries  
Happy Valley Road  
Glasgow, KY 42141  
Barren County

2) **INSPECTOR AND AUTHOR OF REPORT**

Robbie McGuffey  
Environmental Inspector II  
Bowling Green Regional Office

3) **DATE & TIME OF INSPECTION**

November 5, 1992  
11:40 am

4) **PURPOSE OF INSPECTION**

Routine Compliance Evaluation Inspection to Determine facilities compliance with applicable state regulations. Fulfill 1993 RCRA Grant Inspection.

5) **INSPECTION PARTICIPANTS**

Robbie McGuffey, Environmental Inspector  
Division of Waste Management  
Rick Elliott - Production Administrator  
SKF Industries





6) **FACILITY DESCRIPTION**

SKF Bearing Industries manufactures tapered roller bearings. There are four basic products in the production of bearings at the Glasgow facility. These products are cones, cups, rollers, and cages and are all components of a complete bearing assembly. The processes for each product are broken down into three general categories: forming, heat treatment and finishing.

Cones are formed in screw machines. The cones are then processed in a phosphate coating system in preparation for being formed in a 600 ton press. The phosphate serves as a lubricant in the forming operation. The phosphating sludge from this process is permitted for disposal at the City of Glasgow Landfill (TCLP Analysis on file).

The cones are then heat treated. The parts are quenched in oil upon emerging from the furnace. When the oil has been expended the oil is pumped to a waste oil tank in the tank farm and shipped to be disposed of or reclaimed. From this process the cones are washed in a surfactant and water mixture. The waste from this washing process is sent through an oil/water separator and the oil is piped to the waste oil holding tank in the tank farm.

Hazardous waste generated at SKF is D001 Waste Petroleum Naphtha. Components are dipped in solvent tanks for cleaning (photo #3). When the solvent is deemed to be ineffective it is poured through a filter (photo #1) and pumped into a 3000 gallon holding tank (photo #2). SKF generates approximately 600-700 gallons of D001 Petroleum Naphtha waste per month in this tank. The tank is located in a concrete pit with a 4' containment wall around it. Non-regulated waste oil tanks are also located in the area. A sump pump is located in the containment area and pumps rainwater back into the plant to be recirculated through the oil-water separator.

7) **FINDINGS**

SKF's registration as a full quantity generator expired October 31, 1992. SKF has submitted their annual report on time and are expecting their registration. SKF's hazardous waste stream is still D001 Petroleum Naphtha.

SKF's analysis of their waste was reviewed and is kept on file. TCLP analysis was submitted by Griggs and Maloney August 24, 1992.

Their annual report was reviewed and verified. A copy was submitted to Barren County Judge Executive Woody Gardner January 21, 1992. All records for the previous 3 years are on file.

Inspections of SKF of their hazardous waste generation and storage tank are conducted by Leland Rutledge and records of these inspections are maintained in Rick Elliot's office.



Personnel training is conducted by Rick Elliot. Records of training are kept by SKF's personnel manager. Annual retraining is conducted by Rick Elliot. Job titles and job descriptions are included in training records.

SKF's contingency plan was reviewed. William Becker, SKF plant Manager is listed as their primary emergency coordinator. SKF will update their contingency plan to switch primary coordinators from Mr. Becker to Rick Elliot. SKF will submit an updated and revised contingency plan to the KY Environmental Response Team Coordinator Bill Burger and to the Bowling Green Regional Office. All local authorities in Glasgow have copies of SKF's contingency plan and Mr. Elliot is scheduling a tour of the plant with the Glasgow Fire Department.

Manifests to Safety Kleen were checked for 1991 and 1992. SKF was found to be out of compliance for failing to have handling codes for a D001 waste Petroleum Naphtha shipment to Safety Kleen on July 6, 1992, manifest #00003. SKF ships all hazardous waste to Safety Kleen in New Castle KY.

There are no areas in SKF considered to be satellite areas. When solvent is considered to be spent it is drained into buckets and poured through a filter and piped out into the tank farm located behind the plant.

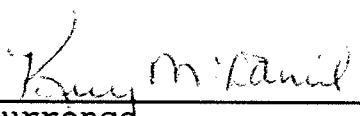
8) **VIOLATIONS AND REMEDIAL MEASURES**

See attached Notice of Violation

9) **SIGNATURES AND DATE OF REPORT**

  
Robbie McGuffey  
Environmental Inspector I

DATE: 11-10-92

  
Concurrence  
Kerry McDaniel  
Environmental Control Supervisor

DATE: 11-17-92

Attachments -  
Photographs  
Notice of Violation

Copies to -  
Frankfort Division of Waste Management  
Federal EPA  
Bowling Green File



## DIVISION OF WASTE MANAGEMENT GENERATOR INSPECTION REPORT

DEP 4038 (REV. 9-92)

**SITE NAME:** 10000 10000 10000 **EPA ID NUMBER:** 10000 10000 10000

**TYPE OF SITE:** Wetland

**REGISTRATION EXPIRES:** 06/30/2025 **REGISTERED ACTIVITIES:<sup>1</sup>** ☐ Small Quantity ☐ Full Quantity

☐ Drum Accumulation ☒ Tank Accumulation ☐ Other Activities

COUNTY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_ ☐ ROUTINE ☐ FOLLOW-UP

I. RECORDKEEPING INSPECTION ITEM	CITE <sup>2</sup>	C <sup>3</sup>	NC	NA	P	R	COMMENTS
1. Operations consistent with registration:	32:010 § 3	✓					
a. All generated wastes on Notification Form	32:010 § 3(4)	✓					
b. Status correctly identified	32:010 § 3(4)	✓					
c. Notification form data correct	32:010 § 3(4)	✓					
d. Up to date registration	32:010 § 3(1)	✓					
2. Hazardous waste determination/analysis record	32:010 § 2	✓					
3. Generator annual report submitted/maintained:	32:040 § 1; 2	✓					
a. Correct information submitted	32:040 § 2(1)	✓					
b. Copy sent to County Judge/Executive	32:040 § 2(3)	✓					
c. Last 3 years on file	32:040 § 1(2)	✓					
4. Inspection requirements:	32:030 §5(1)(d)	✓					
a. Adequate schedule developed/kept:	35:020 §6(1;2)	✓					
1) Container accumulation areas weekly:	35:180 § 5	✓					
a) Check for leaks	35:180 § 5	✓					
b) Address container condition	35:180 § 5	✓					
b. Inspection log details:	35:020 § 6(4)	✓					
1) Date of inspection	35:020 § 6(4)	✓					
2) Time of inspection	35:020 § 6(4)	✓					
3) Inspector's name	35:020 § 6(4)	✓					
4) Notation of observations	35:020 § 6(4)	✓					
5) Date & nature of remedial actions	35:020 § 6(4)	✓					
c. Records maintained at least 3 years	35:020 § 6(4)	✓					
d. Inspections conducted and recorded	35:020 § 6(2;4)	✓					
e. Remedial actions taken	35:020 § 6(3)	✓					
5. Personnel training requirements:	32:030 §5(1)(d)	✓					
a. Adequate training program developed	35:020 § 7(1)	✓					
b. Training conducted by qualified person	35:020 § 7(1)	✓					
c. Appropriate/required employees trained	35:020 § 7(2)	✓					
d. New employees within 6 months	35:020 § 7(2)	✓					

<sup>1</sup> A "Y" means the activity is listed on the Certification of Registration while a "N" means the activity is not listed on the Certification of Registration.

<sup>2</sup>All regulatory cites are from Title 401 of the Kentucky Administrative Regulations. The number preceding the colon is the Chapter reference. The number appearing after the colon is the regulation number. The symbol § is a reference to the section. For example, the reference to "35:020 § 6" should be read as "Section 6 of 401 KAR 35:020" These cites are not comprehensive and other regulatory sections may be applicable.

\*The abbreviation "C" means compliance with the requirement; "NC" means non-compliance with the requirement; "NA" means the requirement is not applicable at the time of the inspection; "P" means a decision on compliance is pending; and "R" means a violation has been consecutively repeated.



SITE NAME:

DATE:

I. RECORDKEEPING INSPECTION ITEM	CITE <sup>2</sup>	C <sup>3</sup>	NC	NA	P	R	COMMENTS
e. Annual retraining	35:020 § 7(3)	✓					
f. Required personnel records:	35:020 § 7(4)	✓					
1) Name and job title	35:020 § 7(4)	✓					
2) Detailed, written job description (duties)	35:020 § 7(4)	✓					
3) Written skill, education & qualifications	35:020 § 7(4)	✓					
4) Training given to & completed by data	35:020 § 7(4)	✓					
g. All training records maintained on-site	35:020 § 7(5)	✓					
6. Contingency Plan & emergency requirements:	32:030 §5(1)(d)	✓					
a. Response actions described as required:	35:040 § 3(1)	✓					
1) 35:040 § 2 - Implementation	35:040 § 3(1)	✓					
2) 35:040 § 7 - Emergency procedures	35:040 § 3(1)	✓					
b. SPCCP, etc. amended for 35:040 provisions	35:040 § 3(2)	✓					
c. Arrangements described	35:040 § 3(3)	✓					
d. Emergency coordinator information	35:040 § 3(4)	✓					
e. List of emergency equipment	35:040 § 3(5)	✓					
f. Copy of contingency plan on-site	35:040 § 4(1)	✓					
g. Distribution of contingency plan	35:040 § 4(2)	✓					
h. Amendment of contingency plan	35:040 § 5	✓					
i. Coordinators' knowledge and authority:	35:040 § 6	✓					
1) Operations, records & waste locations	35:040 § 6	✓					
2) Authority to commit resources	35:040 § 6	✓					
j. Notification of release as required:	35:040 § 7(4)	✓					
1) Local fire & police; state police	35:040 § 7(4)	✓					
2) Local/state/federal ER groups	35:040 § 7(4)	✓					
k. Implementation Report:	35:040 § 2; 7	✓					
1) Time, date & details in report	35:040 § 7	✓					
2) Submitted within 15 days	35:040 § 7	✓					
3) Implementation Reports maintained	35:040 § 7(4)	✓					
7. Arrangements with local authorities:	32:030 §5(1)(d)	✓					
a. Police/fire/hospital/ER teams	35:030 § 7(1;2)	✓					
b. Refusals maintained	35:030 § 7(1;2)	✓					
8. International shipments	32:050 § 1 - 9	✓					
9. Generator manifests:	32:020; 32:100	✓					
a. Required information	32:100	✓					
b. Manifest properly executed	32:020 § 3; 4	✓					
c. Manifest maintained	32:040 § 1	✓					
d. Exception report submitted & maintained	32:040 § 3; 1	✓					
10. Land disposal restricted wastes:	Chapter 37	✓					
a. Determination/analysis	37:010 § 7	✓					
b. Dilution prohibited in lieu of treatment	37:010 § 3	✓					



DEP 4038 (REV. 9-92)

SITE NAME:

DATE:

I. RECORDKEEPING INSPECTION ITEM	CITE <sup>2</sup>	C <sup>3</sup>	NC	NA	P	R	COMMENTS
c. Notice/certification with each shipment:	37:010 § 7						
1) All required information	37:010 § 7						
2) Correct treatment standard	37:010 § 7						
3) Waste analysis sent, if available	37:010 § 7						
II. PHYSICAL INSPECTION ITEM	CITE <sup>2</sup>	C <sup>3</sup>	NC	NA	P	R	COMMENTS
1. Satellite accumulation areas:	32:030 § 5(3)						
a. Maximum of 55 gallons	32:030 § 5(3)(a)						
b. 1 quart maximum if acutely hazardous	32:030 § 5(3)(a)						
c. At or near generation point	32:030 § 5(3)(a)						
d. Operator's control	32:030 § 5(3)(a)						
e. Complies with 35:180 § 2; 3; 4(1):	32:030 § 5(3)(a)1						
1) Condition of containers	35:180 § 2						
2) Compatibility of waste with containers	35:180 § 3						
3) Closed except for adding/removing	35:180 § 4(1)						
f. "Hazardous Waste" marking	32:030 § 5(3)(a)2						
2. Prevention and preparedness:	32:030 § 5(1)(d)						
a. Maintained/operated to prevent releases	35:030 § 2						
b. Required equipment:	35:030 § 3						
1) All Contingency Plan equipment	35:040 § 3(5)						
2) Internal communication or alarm system	35:030 § 3(1)						
3) Telephone or 2-way radio	35:030 § 3(2)						
4) Fire extinguishers, if applicable	35:030 § 3(3)						
5) Absorbent material, if applicable	35:030 § 3						
c. Required equipment maintained/operated	35:030 § 4						
d. Access to communications or alarm	35:030 § 5						
e. Adequate aisle space maintained	35:030 § 6						
3. Accumulation in containers:	32:030 § 5(1)(a)						
a. D.O.T. packaging	32:030 § 1						
b. Accumulation start date:	32:030 § 5(1)(b)						
1) Date clearly marked	32:030 § 5(1)(b)						
2) Date visible for inspection	32:030 § 5(1)(b)						
c. Each clearly marked "Hazardous Waste"	32:030 § 5(1)(c)						
d. Condition of containers	35:180 § 2						
e. Compatibility of waste with containers	35:180 § 3						
f. Management of containers:	35:180 § 4						
1) Drums closed (except adding/removing)	35:180 § 4(1)						
2) Operated to prevent leaks or ruptures	35:180 § 4(2)						
g. Ignitable or reactive waste management:	35:180 § 6						
1) 50 feet from property line	35:180 § 6						
h. Incompatible waste management	35:180 § 7						



INSPECTOR'S SIGNATURE [Signature] TITLE [Signature] DATE 12-21

I hereby acknowledge a copy of this report and further acknowledge that I have been advised of the discrepancies and alleged violation noted during this inspection.

HANDLER'S SIGNATURE [Signature] TITLE [Signature] DATE 12-21



## TANK REPORT

PAGE 5 OF 5

FACILITY NAME: SKF Industries

KRD-006-137-523

DATE: 5-12

I. FACILITY INSPECTION ITEM	CITE*	C	NC	NA	COMMENTS
1. Existing tank systems integrity assessment	35:190 § 2			✓	
2. Design or installation of new tank systems or components	35:190 § 3			✓	
3. Adequate secondary containment	35:190 § 4(1)	✓			✓
4. Annual leak test records maintained	35:190 § 4(9)			✓	✓
5. General operating requirements:	35:190 § 5				
(a) Compatibility of waste with tank system	35:190 § 5(1)	✓			✓
(b) Control & practices to prevent spills and overflows	35:190 § 5(2)	✓			✓
(c) Tank labeled "Hazardous Waste"	35:190 § 5(4)	✓			✓
6. Inspections conducted & recorded:	35:190 § 6	✓			
(a) Daily requirements	35:190 § 6(1,3)	✓			
(b) Cathodic protection systems requirements	35:190 § 6(2,3)			✓	
7. Response to leaks or spills & disposition of leaking or unfit-for-use tank systems	35:190 § 7			✓	
8. Closure & post-closure care	35:190 § 8			✓	
9. Ignitable & reactive waste management	35:190 § 9	✓			
10. Incompatible waste management	35:190 § 10			✓	
11. Waste analysis and trail tests	35:190 § 11			✓	

## II. COMMENTS INCLUDING REMEDIAL MEASURES AND EXPECTED CORRECTION DATES

- No violations observed in Tank Area. No problems observed with secondary containment.

- Hazardous waste label was clearly visible and accessible. (photo 2)

\*All regulatory cites are from Title 401 of the Kentucky Administrative Regulations. The number preceding the colon is the chapter reference. The number appearing after the colon is the regulation number. The symbol "§" is a reference to the section. For example, the reference to 35:190 § 5 should be read 401 KAR 35:040, Section 5. These citations are not comprehensive and other regulations may be applicable.

"C" means compliance with the requirement; "NC" means non-compliance with the requirement; and "NA" means the requirement is not applicable at this time.

INVESTIGATOR'S INITIALS: LM

OWNER'S OR OPERATOR'S INITIALS: \_\_\_\_\_

DEP4037-2 10/84  
1ST REV. 3/88

White Copy - Central Office Copy  
Yellow Copy - Regional Field Office Copy  
Pink Copy - Regulated Community Copy



**DATE:** 10-17-2013

[illegible]

